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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

NORTHERN CALIFORNIA GLAZIERS,  
ARCHITECTURAL METAL AND GLASS  
WORKERS PENSION PLAN, et al.

Plaintiffs,

v.

AMERICAN RIVER GLASS, INC., a  
California Corporation,

Defendant.

Case No.: C11-3965 JSW

**REQUEST TO CONTINUE CASE  
MANAGEMENT CONFERENCE;  
PLAINTIFFS' CASE MANAGEMENT  
CONFERENCE STATEMENT;  
~~PROPOSED~~ ORDER THEREON**

Date: December 2, 2011

Time: 1:30 p.m.

Ctrm: 11, 19<sup>th</sup> Floor

Judge: The Honorable Jeffrey S. White

Plaintiffs herein respectfully submit their Case Management Statement, requesting that the Case Management Conference, currently on calendar for December 2, 2011, be continued for approximately 60–90 days, pending the outcome of Plaintiffs' attempts to settle this matter without the further intervention of the Court, or if informal settlement attempts are unsuccessful, filing a Motion for Default Judgment.

1. As the Court's records will reflect, a Complaint was filed in this matter on August 12, 2011, to compel Defendant's compliance with the terms of its Collective Bargaining Agreement, by scheduling an audit for the period of August 1, 2008 through the date of audit, and by providing all documents necessary to complete that audit.

2. Service on Defendant was effectuated on August 16, 2011, and a Proof of Service of Summons was filed with the Court on August 24, 2011.

3. On September 12, 2011, the Clerk entered the default of Defendant.

4. To date, Defendant has failed to plead or otherwise defend or appear in this action. Plaintiffs are currently attempting to settle this matter without the further intervention of the Court. If informal settlement is not reached within the next three to four weeks, Plaintiffs anticipate filing a Motion for Default Judgment with the Court within the next sixty days.

5. There are no issues that need to be addressed at the currently scheduled Case Management Conference. In the interest of conserving costs as well as the Court's time and resources, Plaintiffs respectfully request that the Case Management Conference, currently scheduled for December 2, 2011, be continued for 60-90 days to allow continued attempts at informal settlement, or filing and disposition of a Motion for Default Judgment if informal settlement is not reached.

I declare under penalty of perjury that I am the attorney for the Plaintiffs in the above entitled action, and that the foregoing is true of my own knowledge.

Executed this 22nd day of November, 2011, at San Francisco, California.

SALTZMAN & JOHNSON  
LAW CORPORATION

By: /s/Blake E. Williams

Blake E. Williams  
Attorneys for Plaintiffs

IT IS SO ORDERED.

Based on the foregoing, and GOOD CAUSE APPEARING, the currently set Case Management Conference is hereby continued to February 3, 2012. All related deadlines are extended accordingly.

Date: November 28, 2011

  
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THE HONORABLE JEFFREY S. WHITE  
UNITED STATES DISTRICT COURT JUDGE